

EXHIBIT A

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

James Walters, on Behalf of
Himself and Those Similarly Situated,
Plaintiffs,

vs. CASE NO. 3:16-CV-01678-1-MDD

Target Corp.,

Defendant.

DEPOSITION OF ALI ASHRAF

Taken July 19, 2018

Commencing at 5:20 p.m.

REPORTED BY: KELLEY E. ZILLES, RPR

1 Q. Did you have any responsibility for the Target
2 Check Card at any point before it was renamed the Target
3 Debit Card?

4 A. I do not recall exactly when it was renamed
5 Target Debit Card, so I cannot answer that question.

6 Q. If I represented to you that it was renamed in
7 2010, did you have in 2010 any involvement with the
8 Target Check Card?

9 A. Yes, it was later that year that I began on the
10 product, it would have been December of 2010.

11 Q. Okay. Let me ask you about one of the topics,
12 the first topic why you're here to talk about today,
13 which is consumer complaints regarding the processing
14 time for transactions made with the Target Debit Card.
15 First of all, are you aware of any such complaints
16 having been made in the last six years?

17 A. Can you please repeat the question.

18 Q. Sure. Are you aware of any complaints regarding
19 the processing time for transactions made with the
20 Target Debit Card in the last six years?

21 A. Yes, but there are very few because the product
22 is explained on the agreements and the nature of the
23 product is explained at the top of the agreements.

24 Q. And when you say very few, how many are you
25 aware of?

1 problem has been, or the excessive fees that those
2 guests were incurring, that issue has been resolved.
3 And apart from that I have not personally from a
4 strategy perspective received complaints about the debit
5 card having, about the processing time for the Target
6 Debit Card because it was resolved via strategies.

7 Q. Okay. So putting aside your personal awareness
8 of complaints, has Target received complaints regarding
9 the processing time for the debit card transaction, of
10 debit card transactions?

11 A. We began to track this only recently within the
12 last year and during that time it's a very, very small
13 number since we began tracking it.

14 Q. So let me ask you this, are complaints stored in
15 a central repository somewhere?

16 A. They are tracked by the call centers in one
17 repository or another. As far as calls, calls that are
18 made are generally classified since last year regarding
19 the Target Debit Card and what the nature of those calls
20 were.

21 Q. And prior to last year were they classified as
22 regarding the Target Debit Card?

23 A. They were not classified prior to last year, but
24 there were very few complaints.

25 Q. And you know that because you've reviewed the

1 complaints prior to last year?

2 A. No, they were not passed to me since we
3 rectified the issues raised by those concerns.

4 Q. Has Target received any complaints in the last
5 six years regarding how the Target Debit Card functions?

6 A. Can you please explain what you mean by
7 functions.

8 Q. The timing with which payments are deducted from
9 accounts?

10 A. If there were any made, they were not made
11 directly to me because it was a very minor number of
12 complaints with regard to the processing time for Target
13 Debit Card transactions.

14 Q. Okay. Have you researched whether complaints
15 made between 2012 and today have concerned the
16 processing of transactions made with the Target Debit
17 Card?

18 A. No. The first time that I heard about this
19 issue was when it was raised by a guest who had incurred
20 numerous fees and to that point we addressed it with
21 about four policies and since then it's just not been a
22 point of contention.

23 Q. Okay. But I'm asking the specific question, so
24 of all the complaints that have been made to Target in
25 the last six years, do you know whether or not any of

1 those complaints concerned the processing of Target
2 Debit Card transactions?

3 A. As I stated, prior to last year they were not
4 classified. And so if a complaint was consistent and it
5 was something that needed to be addressed, I would
6 address that complaint. And because it was not tracked
7 before last year, I cannot answer your question. But
8 from the perspective of the first time I heard this
9 being an issue, we rectified it via four strategies.

10 Q. So you're making the assumption that you would
11 have heard of a complaint if the complaint was made
12 regarding Target Debit Card transactions, is that right?

13 A. That is correct.

14 Q. What about complaints regarding fees assessed on
15 Target Debit Card transactions?

16 A. Similarly, I would have received those and
17 that's what we rectified.

18 MR. MCGUIRE: Jeff, before the next
19 question can we take a very short break?

20 MR. KALIEL: Sure.

21 (A break was taken at 5:31 p.m.)

22 BY MR. KALIEL:

23 Q. What is the complaint dashboard, if you know?

24 A. This is a system where the call centers keep
25 track of calls made.

1 Q. Do you know for how long Target's call center
2 has been keeping track of calls made?

3 A. As far as Target Debit Card is concerned, it was
4 sometime last year.

5 Q. What happens if, what would have happened if a
6 consumer called into Target in 2014, for example, and
7 had a complaint about a Target Debit Card, what would
8 have happened with that complaint, if anything?

9 MR. MCGUIRE: Objection, outside the scope.
10 You may answer. That's the first objection I've made,
11 you may answer.

12 THE WITNESS: Thank you.

13 A. If it was made at that time it would not have
14 been tracked officially in a repository or categorized.

15 Q. And by tracked you mean it wouldn't be saved
16 anywhere, there would be no record of it, is that what
17 you're saying?

18 A. I'm not saying that. I'm saying it was not in
19 an actual system that was set aside to categorize it in
20 a single space.

21 Q. Okay. Would it have been saved anywhere, a
22 record of that call and that complaint?

23 MR. MCGUIRE: Objection, outside the scope,
24 calls for speculation.

25 A. The calls would have been saved and there may

1 have been some records via emails within the REDcard
2 guest services, however, I do not know where that system
3 would have been or where they would have stored them.

4 Q. Why did Target start tracking complaints
5 regarding the debit card in I think you said last year?

6 MR. MCGUIRE: Objection, outside the scope,
7 calls for speculation, lacks foundation.

8 A. I do not know.

9 Q. We'll switch topics for a bit. What percentage
10 of Target Debit Card transactions today are authorized?

11 [REDACTED]
12 [REDACTED] [REDACTED]
13 [REDACTED] [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED] [REDACTED]
23 [REDACTED]
24 [REDACTED]

25 Q. And how were you able to make it a step for that